



**DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
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WASHINGTON, D.C. 20350-1000**

AGC(E) 03098
September 15, 2003

MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES

Subj: ARMED FORCES COMMUNICATIONS AND ELECTRONICS
ASSOCIATION (AFCEA) AWARD DINNER HONORING GENERAL AL GRAY,
USMC (Ret.)

The Armed Forces Communications and Electronics Association (AFCEA) will hold an award banquet at the Ritz-Carlton Pentagon City on September 24, 2003. General Al Gray, USMC (Ret.) will be awarded AFCEA's highest award, the David Sarnoff Award. It is expected that approximately 300 people from the military, government, and industry will attend and that persons representing a diversity of views or interests will be present. The fair market value of attendance is estimated to be \$75.00.

The Department of the Navy has determined that attendance by Department of Navy personnel at this event in their personal capacities qualifies as an exception under 5 C.F.R. 2635.204(g)(2). This memorandum also constitutes a blanket determination of agency interest under 5 C.F.R. 2635.204(g)(3)(ii). Accordingly, Department of the Navy personnel whose duties do not substantially affect AFCEA may accept free attendance at this event which includes the provision of food, refreshments and entertainment furnished to all attendees as an integral part of the event. They may not, however, accept travel expenses or lodgings personally.

Department of the Navy employees whose duties may substantially affect AFCEA should seek an individual determination pursuant to 5 C.F.R. 2635.204(g)(3)(i) regarding this event from their local ethics counselor.

It is my understanding that attendees will also receive a crystal paperweight valued at \$15.00. Acceptance of the paperweight is not authorized pursuant to this widely attended gathering determination but may be accepted under 5 C.F.R. 2635.204(a), an unsolicited gift having a market value of \$20 or less.

A handwritten signature in cursive script, reading "David W. LaCroix", is positioned above the printed name.

David W. LaCroix
Assistant General Counsel (Ethics)